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OCT 23 2001

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336

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EDMC

Dear Mr. Wilson:

**DEVELOPMENT OF REVISED SAMPLING AND ANALYSIS PLAN (SAP) FOR THE
384 POWERHOUSE BUNKER TANKS**

This is in response to the letter from J. B. Price, Ecology, to J. Hebdon, RL, "Transmittal of the Sampling and Analysis Instruction for the Removal of the 284 Underground Fuel Bunker," dated July 26, 2001, as regards comments and specific recommendations for the 384 Powerhouse Bunker Tanks corrective action. Since the issuance of the aforementioned letter, several actions have been completed and further discussions with the State of Washington Department of Ecology (Ecology) have been held. As confirmation of our discussions and in response to your recommendations, the following information is being provided.

1. Excavation to 15 feet below grade:

Following removal of the 26-foot by 209-foot bunker tanks, an area approximately 45 feet wide by 230 feet long was excavated to a depth of 15 feet below grade. While some petroleum contamination was noted at the base of the excavation, removal of petroleum-contaminated soils to that depth should prevent dermal exposure to workers and the public and minimize intrusion by plants and animals.

2. Sample and analyze the soil in accordance with a SAP that incorporates Ecology's comments:

The Sampling and Analysis Instruction submitted to Ecology was written to close a relatively clean site. The conditions we found below the tank were substantially different than anticipated. As discussed in previous meetings, the SAP will need to be rewritten to ensure that the vertical and lateral extent of contamination can be defined and to establish the process to be used to determine if cleanup standards have been met. We will work closely with Ecology in developing the methodology for the accomplishment of these purposes. It is anticipated that the revised sampling and analysis plan will be submitted prior to the end of November 2001.

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3. Evaluate the results from the implementation of the SAP against cleanup standards:

Confirmatory sampling is expected to begin as soon as concurrence on the methodology is obtained to determine whether further action(s) would be necessary.

4. Complete testing of the groundwater:

Discussions are underway with the authors of the 300-FF-5 Operable Unit Operation and Maintenance Plan to include monitoring for contaminants related to petroleum contamination from the bunker tanks. Opportunities to collect samples to develop a baseline until the Operations and Maintenance Plan can incorporate the changes are being investigated.

The integration of this corrective action for the bunker tank site with the overall cleanup of the 300 Area under the Comprehensive Environmental Response, Compensation and Liability Act, as an Applicable Relevant and Appropriate Requirement, appears appropriate. Following completion of remediation of the excavated soils and the investigation to more fully characterize the site, subsequent actions can be managed under the CERCLA process. If the ongoing sampling activities prove necessary and appropriate, this would require your support and concurrence from the U.S. Environmental Protection Agency to amend the 300-FF-2 Record of Decision to incorporate this corrective action. If you have any questions, please call Alex E. Teimouri, of my staff, on (509) 376-6222, or Bob McLeod, RL Environmental Restoration Division, on (509) 372-0096.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:AET

cc: B. J. Dixon, FHI
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